

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

JESUS FIGUEROA AGOSTO

Case No. 11-05968 (ESL)

Debtor

Chapter 7

Asset

**UNITED STATES TRUSTEE'S MOTION TO EXTEND TIME
FOR FILING MOTION TO DISMISS UNDER § 707(b)(1) AND (b)(3)
AND FOR FILING A COMPLAINT OBJECTING TO DISCHARGE UNDER §727**

Comes now the United States Trustee, in furtherance of the administrative duties imposed pursuant to 11 U.S.C. §586(a), and hereby moves this Court for the entry of an order extending the time for filing a motion to dismiss pursuant to §§ 707(b)(1) or (b)(3) and for filing a complaint objecting to discharge pursuant to § 727, and states the following in support of the motion:

1. The debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on July 13, 2011.

2. The time period for filing a motion to dismiss pursuant to 11 U.S.C. 707 (b)(1) and (b)(3) and for filing a complaint under 11 U.S.C. § 727 expires on October 17, 2011 (dkt. # 5).

3. The first date set for the meeting of creditors was scheduled for August 16, 2011 (dkt. # 5). The meeting has been continued several times: to August 18, 2011, then to September 20, 2011 (dkt. # 10), and again to September 29, 2011. The United States Trustee questioned debtor at the meeting held on September 29, 2011. The United States Trustee and the chapter 7 trustee requested certain information and documents from debtor. The meeting of creditors was further continued to October 25, 2011 (dkt. # 15).

4. The chapter 7 trustee continues to investigate the financial affairs of debtor.

5. In view of the above, particularly given that the new date for the meeting of creditors is beyond the October 17, 2011 deadline referred to in paragraph 2 above, the United States Trustee needs additional time to have the opportunity to review the information and documents to be produced by debtor, to further question debtor at the continued meeting of creditors, and to make a determination on whether to file a motion under §§ 707(b)(1) and (b)(3) or an objection to the discharge under § 727.

6. Accordingly, the United States Trustee requests an extension of the time for filing a motion to dismiss or a complaint objecting to the debtor's discharge for ninety (90) days from October 17, 2011, that is, until January 15, 2012.

WHEREFORE, the United States Trustee moves this Court, pursuant to Fed. R. Bankr. P. 1017(e) and 4004(b), to extend the time within which the United States Trustee may file a motion to dismiss the case pursuant to 11 U.S.C. Sec. 707(b)(1) or (b)(3) or file a complaint objecting to the debtor's discharge pursuant to 11 U.S.C. Sec. 727 for ninety (90) days from October 17, 2011, that is, until January 15, 2011, and for such other and further relief the Court deems appropriate.

- CERTIFICATE OF SERVICE -

I DO HEREBY CERTIFY that on this day I electronically filed a true and exact copy of the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

JOSE F CARDONA JIMENEZ jf@cardonalaw.com, cardonalaw@prtc.net

JOSE L JIMENEZ QUINONES jimenezlawoffice@gmail.com, jljimenez11@gmail.com

UNITED STATES TRUSTEE'S MOTION TO EXTEND TIME
FOR FILING MOTION TO DISMISS UNDER § 707(b)(1) AND (b)(3)
AND FOR FILING A COMPLAINT OBJECTING TO DISCHARGE UNDER §727
Case No. 11-05968 (ESL), In re Jesus Figueroa Agosto

Page 3 of 3

MONSITA LECAROSZ ARRIBAS ustpregion21.hr.ecf@usdoj.gov

ANGEL M VAZQUEZ BAUZA avazquez@enrassociates.com, enrasoc@coqui.net

NOREEN WISCOVITCH RENTAS courts@nwr-law.com, nwiscovitch@ecf.epiqsystems.com

I DO HEREBY FURTHER CERTIFY that on this same date a true and exact copy of the foregoing has been *sent by regular United States mail* to debtor:

JESUS FIGUEROA AGOSTO
PO BOX 8842
CAGUAS, PR 00726

RESPECTFULLY SUBMITTED.

Dated: October 17, 2011

DONALD F. WALTON
United States Trustee for Region 21

MONSITA LECAROSZ ARRIBAS
Assistant United States Trustee

OFFICE OF THE U.S. TRUSTEE
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901-1922
Telephone: (787) 729-7444
Telecopier: (787) 729-7449

[Electronically Filed]

By: s/Nancy Pujals
Nancy Pujals
Trial Attorney
USDC #201103